

FILED

MAY 19 2025

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

LONNIE THOMPSON,

Plaintiff,

-vs-

HENSLEY, et al.,

Defendants.

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Case No. 1:23-cv-01656

Honorable Judge Pamela A. Barker

Honorable Magistrate Judge James

E. Grimes

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MOTION FOR EXTENSION OF TIME  
TO FILE REPLY TO DEFENDANT'S  
MOTION TO DISMISS

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Now comes the Plaintiff, Lonnie Thompson, pro-se who respectfully requests and moves this Honorable Court to Grant this Motion For Extension of Time To File Reply To Defendant's Motion To Dismiss.

Further reasons are within the attached Memorandum In Support.

Respectfully submitted,



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Mr. Lonnie Thompson, pro-se  
# 640-614  
Richland Correctional Inst.  
Post Office Box 8107  
Mansfield, OH 44901

MEMORANDUM IN SUPPORT

The Plaintiff, Lonnie Thompson would not request for an Extension of Time had the Counsel for the defendants not stated in their Motion of Notice of Substitution of Counsel, see attached Exhibit "A", that service of summons and amended complaint by the United States Marshal Service did not appear to be perfected, nor had a request for representation been received from added defendants Cornwell and Wheeler dated 04/21/2025.

This Notice of Substitution was recorded and time-stamped by the Clerk of Courts as being filed on 04/21/2025. The Plaintiff received said Notice on April 28, 2025. Plaintiff then in turn filed a Notice To The Court For Non-Service of the United States Marshal Service on Defendants Cornwell and Wheeler. See attached Exhibit "B".

The Plaintiff having not received any notices from prior pro bono counsel, Joseph Sobecki of any record of United States Marshal Service of the two (2) new added defendants, Cornwell and Wheeler. The service of the Summons and Admended Complaint. The Plaintiff immediately notified this Honorable Court of the possibility that service may or may not have been perfected.

Four (4) days after the Plaintiff sent Exhibit "B" out to the Court, Counsel for the defendants (Mindy Worly (0037395)), miraculously filed their Motion To Dismiss, see attached Exhibit "C". This Motion, Doc #: 70 Filed 04/25/2025 1 of 16 Page ID#:479 was received by the Plaintiff on May 06, 2025.

Either the new counsel for the defendants had not been aware of the United States Marshal Service in their Motion of Notice of Substitution of Counsel, FootNote 2, or this was an intentional mistake on their behalf.

Regardless, it was a unnecessary waste of resource of the Courts' time and of the Plaintiff's to have to file a unnecessary Motion of Notice To The Court and have the Plaintiff request this Honorable Court to order the Clerk of Courts issue a document that the defendants' counsel should have known existed already. Which by the way seems now obvious that counsel already had this knowledge before hand.

Respectfully submitted,

  
Mr. Lonnie Thompson, pro-se  
# 640-614

#### CONCLUSION

The Plaintiff prays and respectfully request that this Motion For An Extension of Time be Granted. That the Plaintiff has shown good cause and in good faith with respect for the Court's time in this matter.

  
Mr. Lonnie Thompson, pro-se  
# 640-614

#### CERTIFICATE OF SERVICE

I, Lonnie Thompson do certify that a true copy of the Motion For Extension of Time to File Reply to Defendants' Motion to Dismiss has been mail out to the Ohio Attorney General Office located at 30 E. Broad St., 23rd Floor, Columbus, OH 43215 on this 9th day of May, 2025.

  
Mr. Lonnie Thompson, pro-se